

REMARKS

In the Office Action mailed April 2, 2004 the Examiner noted that claims 1-22 were pending, and rejected claims 1-22. New claims 23 and 24 have been added and, thus, in view of the forgoing claims 1-24 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

Page 2 of the Office Action rejects claims 1-4, 6-9, 11-14, 16-20 and 22 under 35 U.S.C. § 103 over Kato "in view of Cusson et al. (U.S. Patent 6,385,605, hereafter 'Cusson')". Page 6 rejects claims 5, 10, 15 and 21 over Kato, Cusson and Sundaresan.

As discussed with the Examiner in a telephone call, the 6,385,650 reference corresponds to a patent to Suzuoka et al. and does not include Cusson as an inventor. In addition, the discussion of Cusson in the Action does not correspond to the actual text and drawings of 6,385,650. For example, on page 3 of the Action, the Examiner references steps 605-609 of Cusson figure 6. There are no reference numbers 605-609 in figure 6 of 6,385,650 or anywhere else in 6,385,650. It appears that a mistake has been made in basing the rejection on 6,385,650. Withdrawal of the rejection for this reason is requested.

In the above-identified rejection the Examiner admits that Kato does not teach certain features of the present invention and relies on 6,385,650 to provide such features. It is submitted that 6,385,650 does not teach or disclose these features acknowledged to be missing from Kato. Withdrawal of the rejection for this reason is requested.

To move this application forward even in view of the possible mistake noted above, as also discussed with the Examiner, it is submitted that in the event there is a Cusson reference that supplies the information not found in 6,385,650, the present invention is patentable there over because the invention is further distinguishable over Kato and Sundaresan as discussed below.

The present invention is directed to a full text or character string search type retrieval system where a plurality of terminals can submit retrieval or search requests. The invention is designed to allow the receipt of retrieval requests from the terminals in rapid succession one after the other and substantially continuously and be able to return retrieval results virtually in the same response time as required for a request from only one terminal. To do this the system combines the requests from multiple character string search requests into a single search request. That is, a single search is performed for the multiple character string search requests. For example, assume that 1000 terminals substantially simultaneously submit different text

retrieval requests. The present invention combines all 1000 queries into a search request and this combined search request is executed so that the character string search is conducted once. The claims emphasize this by "generating a retrieval request expression variable table" in which the search expressions are stored and performing a search of the database to extract a retrieval result matching the retrieval conditions from the terminals using or "according to the generated retrieval request expression variable table" (see claim 1).

Kato, in contrast, does not combine multiple searches into a single search. Rather Kato attempts to make any search more effective by breaking it up into three stages. To do this the text being searched is stored in three different embodiments: the original text, contracted text and a character component table. In a first pre-search stage, the character component table is searched for matches to the target text string. In a second pre-search stage the contracted text is searched to eliminate unneeded documents. In the third stage, the original text is searched. In the 1000 request example noted above, Kato would search each of the character component table, the contracted text and the original text 1000 times. Kato uses a LAN to increase search speed by running a search in parallel in multiple machines at the same time over the LAN. Kato is directed at performing a single search in the shortest possible time. Kato does not address how to speed up multiple search requests received at the same time. Rather, Kato assumes searches will be done serially in a FIFO type of order, even when they arrive at substantially the same time.

Sundaresan is directed to transforming an XML document with a first XML definition into another XML document having another XML definition using pattern-matching technology. Sundaresan does not address the features of the invention discussed above. Sundaresan is non-analogous art (translation) to that of the present invention (searching).

It is submitted that the invention of the independent claims distinguishes over the prior art and withdrawal of the rejection is requested.

The dependent claims depend from the above-discussed independent claims and are patentable over the prior art for the reasons discussed above. The dependent claims also recite additional features not taught or suggested by the prior art. For example, claim 2 calls for keeping the retrieval condition in the buffer until the retrieval is completed. The Examiner asserts that a least recently used caching scheme is equivalent to this. It is submitted that it is not. For example, a least recently used page (or search) can eventually become the page (or search) that is overwritten even if the search is not completed. Think of the 1000 requests situation discussed above and it is easy to understand that the first of those requests could be

overwritten before it is completed in the Kato FIFO search method. It is submitted that the dependent claims are independently patentable over the prior art.

New claims 23 and 24 emphasize the combination of the search request to perform a search and claim 24 also emphasizes using a correspondence table to provide the search results back to or for the appropriate search request. Nothing in the prior art teaches or suggests such. It is submitted that these new claims distinguish over the prior art.

It is submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.


If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,
STAAS & HALSEY LLP

Date: _____

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By: _____


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